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2015 JAN -7 PM 5:39

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

UNITED STATES OF AMERICA,

SA 15 CR 0024

Plaintiff,

CRIMINAL NO.

v.

DAE

JUAN MANUEL MUÑOZ-LUEVANO aka)

"EL INGENIERO" aka "EL INGE")

aka "MONO" aka "THE ENGINEER")

aka "MANUELITO")

Defendant.)

GOVERNMENT'S MOTION TO SEAL INDICTMENT

TO THE HONORABLE JUDGE OF SAID COURT:

Comes now the United States of America, by and through the United States Attorney for the Western District of Texas, and files this its Motion to Seal the Indictment in this cause, and would show the Court as follows:

I.

On this date the United States has submitted to the Grand Jury a proposed indictment naming the Defendant in this cause, and the Grand Jury has returned a True Bill of Indictment. Because the Defendant has not been arrested and is not otherwise in custody, premature disclosure of this Indictment in the public record may afford the Defendant an opportunity to avoid apprehension. Such disclosure may additionally disrupt an on-going criminal investigation.

Accordingly, the United States respectfully requests that this Court order that the indictment, warrant for defendant's arrest, and documents relating to this indictment remain

sealed; provided, however, that a redacted copy of the indictment shall be delivered to the defendant at the time of said defendant's initial appearance (conducted pursuant to Rule 5, Fed.R.Crim.P.), or arraignment (conducted pursuant to Rule 10, Fed.R.Crim.P.), whichever is applicable.

The United States further respectfully requests that this motion and the Court's order remain under seal.

Respectfully submitted,

ROBERT PITMAN
United States Attorney

By:


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